

# **EXHIBIT 3**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LG PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG CO., TATUNG COMPANY  
OF AMERICA, INC., and VIEWSONIC  
CORPORATION,

Defendants

Civil Action No. 04-343-JJF

**COMBINED INITIAL DISCLOSURES OF  
DEFENDANT TATUNG COMPANY OF AMERICA AND TATUNG COMPANY**

ROSENTHAL, MONHAIT, GROSS &  
GODDESS, P.A.  
Jeffrey S. Goddess (Del. Bar. No. 630)  
919 Market Street, Suite 1401  
P.O. Box 1070  
Wilmington, Delaware 19899-1070  
Tel: 302-656-4433  
Fax: 302-658-7567  
jgoddess@rmgglaw.com

OF COUNSEL:

Julian M. Baum  
Robert C. Weems  
BAUM & WEEMS  
58 Katrina Lane  
San Anselmo, CA 94960  
Tel: 415-460-1791  
Fax: 415-457-9157

July 29, 2005

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, the defendant Tatung Company (“TROC”) and defendant Tatung Company of America (“TUS”), hereby provide Initial Disclosures. Because TROC’s and TUS’s respective investigation and discovery are ongoing, each reserves the right to amend or supplement its disclosures at an appropriate time.

**1. Fed. R. Civ. P. 26(a)(1)**

Based on the limited information now available, TROC and TUS respectively identify the following individuals as likely to have discoverable information that TROC and/or TUS may use to support claims or defenses and, without limitation, general subject matters upon which TROC and/or TUS currently believe these persons may have information. TROC and TUS each reserve the right to object to the deposition or testimony of any individuals below, under the applicable rules and the inclusion herein is not a representation of such person’s availability to testify nor of an ability to produce such person.

Name/Contact Information	General Subject Matter
Vincent Liu Tatung Company, through counsel	Design and Manufacture of Accused Product (L17AMTN)
S.Y. Tsai Tatung Company, through counsel	Design and Manufacture of Accused Product (L17AMTN)
Huang Chin-Min Tatung Company, through counsel	Design and Manufacture of Accused Product (42" Plasma TV)
Oliver Shih Tatung Company, through counsel	Marketing and sales of Accused Products above identified by Tatung Company
Vincent Liu Tatung Company, through counsel	Prior art including at least the Tatung L4KAS mechanical, design, manufacture
David Wang No.11, Minle St., Sinjhuan City, Taipei County 242, Taiwan (R.O.C.)	Prior art including at least the Tatung L4KAS electrical
Andrew Sun Tatung Company of America, through counsel	Tatung Company of America’s sales and marketing of above identified accused products and of prior art
Jong Hwan Kim	Patents In Suit, including but not limited to

Kyunggi-Do, Korean Republic	purported invention, prior art, prosecution of patents-in-suit, assignment
Young Woo Cho Kyunggi-Do, Korean Republic	Patents In Suit, including but not limited to purported invention, prior art, prosecution of patents-in-suit, assignment
Song Jung McKenna Long & Aldridge 1900 K Street NW Washington, DC 20006-1108 1.202.496.7413	Prosecution of Patents in Suit
Kenneth D. Springer Volentine Francos & Whitt PLLC 1 Freedom Square 11951 Freedom Dr #1260 Reston, VA 20190 (703) 715-0870	Prosecution of Patents in Suit
Scott J. Hawranek Nixon Peabody LLP 401 9th Street, NW Suite 900 Washington DC US 20004-2128 202-585-8000	Prosecution of Patents in Suit
Rebecca Rudich, McKenna Long & Aldridge, LLP 1901 K Street, NW Washington DC US 20006 202-496-7463	Prosecution of Patents in Suit
John M. Kelly Kelly and Tolin □ 18 Oak Street □, Salem NJ US 08079 □ 202-744-4787	Prosecution of Patents in Suit
Mark Brinkerhoff, Fusion Design, 591 W. Hamilton Ave., Ste 160, Campbell, CA 95008 408-378-9980	Patents-in-suit, prior art, anticipation, claim terms
William Bohannon, FTI Tekicon, 3031 Tech Way, Ste 1010, San Jose, CA 95126 408-261-8800	Patents-in-suit, prior art, anticipation, claim terms
Stuart Morgan, 3 Assabet Road, Westford MA	Prior art including at least PixelVision displays
Brian Hotaling, 9 Jean Road, Arlington MA	Prior art including at least PixelVision displays
Arthur J. Flagg III, 23 East Street, Westford, MA	Prior art including at least PixelVision displays
Jon R. Rossman, 89 Park Road, Chelmsford, MA	Prior art including at least PixelVision displays
Wade Chan,	Prior art including at least CTX Panoview

JJ Chang , or other CTX designee 11, Li-Hsin Rd, Science-Based Industrial Park, Hsinchu, Taiwan, R.O.C	flat panel displays
Tim Rodd Chart House, Sandy Lane, Lyndhurst, Hampshire SO43 7DN John Wiseman, Hillsboro Beach FL Kazuhiko Yamazaki, Hiratsuka, JP	Prior art including at least IBM 9052
William Lewis, Mountain View, CA William J. Schoenfield, Saratoga, CA Robert Ricommini, Saratoga, CA Vijay Char, San Jose CA	Prior art including at least Apple duo and other products or product designs
Rob J. Gemmell, Santa Clara CA Stephen Peart, Loc Gatos, CA	Prior art including at least Apple FPD and other Apple products or product designs
Tom Searby, Colorado Springs, CO. Henry Y Chin, Portland OR Jan Hippen, Portland OR David J. Hodge Bradly J. Foster Steven J. Kommrusch	Prior art including at least HP 1010a
Craig M. Leversult, Mountain View Michael F. McCormick, Jr., San Jose Robert J. Lajara, San Jose Alan W. Lam, Fremont Peter C.D. Ta, Hayward Howard W. Stolz, Soquel Jay K. Osborn, San Francisco Micheal S. Dann, Mountain View Ronald Barnes, Livermore	Prior art including at least Sun SPARCStation Voyager and related patents
Jerry Meerkatz, Vice President, PC Options Division, Compaq Computer Corporation and/or other former employees of Compaq Computer Corporation	Prior art including at least Compaq 640 and other Compaq flat panel displays
Michael Zapka Pearlyn Lim Tuan Ngyen Viewsonic Corp., through counsel	Prior art including at least Viewsonic 140
Designee of Advantech, No. 1, Alley 20, Lane 26, Rueiguang Road, Neihu District, Taipei 114, Taiwan, R. O. C.	Prior art including at least Advantech PPC-140T
Hee Gook Lee Sung Yong Kang LG Electronics Inc. LG Twin Towers	Prior art, licensing

20 Yido-dong, Youngdungpo-gu Seoul 150-721, Korea	
Joosup Kim LG Semicon Co., Ltd. 16 Woomyeon-Dong, Seocho-Gu 137-140 Seoul 137-140, Korea	Prior art, licensing
Ad Huijsser Bruce I. Berkoff; Budiman Sastra, Woo Shik Kim, Sang Deog Yeo Ho Lee and corporate designees LGPhilips LCD Co., through counsel	Prior art, marketplace representations concerning patents-in-suit, licensing, patents-in-suit, patents-in-suit family of patents; applications for patent; sales; damages allegations; infringement investigation; manufacture of FPD products and/or components
Mr. David Chang Philips China	Prior art
Charles Hopper Ted Wood	Prior art including at least Cockpit Displays
Chen, Chin-Mao; Hsintien, Taiwan	Prior art including at least US5041965: Laptop computer with detachable display for overhead projector; and other Rever Computer Inc. products
Hashimoto, Yoichiro; Yokohama, Japan Misono, Hideo; Yokohama, Japan	Prior art including at least US Patent 5,119,204: Liquid crystal television set having driving circuit on peripheral portion and method of fabrication of image display section; Hitachi, Ltd., Tokyo, Japan
Ma, Hsi-Kuang; 4F, No. 48, Sec. 2, Chung Cheng Rd., Taipei, Taiwan	Prior art including at least US Patent 5,570,267: Flat display module
Tsutomu Toyoshima Fujitsu General Ltd., Japan	Prior art including at least Japanese Patent 08-268137
Kazuhiro Mizutani Fujitsu General Ltd., Japan	Prior art including at least Japanese Patent 09-190156
Kiyotaka Naitoh Sumitomo Wiring Systems, Ltd., Japan	Prior art including at least Japanese Patent 05-188810
Mike Zapka Twon Wen Per Lim Viewsonic Corp., through counsel	Viewsonic operations and prior art at least as reflected in prior testimony herein
Satoshi (Sam) Matsuno and/or other current or former employees of Display Search	Prior art
Massaki Konno, Yokohama, JP Shuji Ito, Yokohama, JP	Prior art including at least US Pat. 5,546,270
Takeshi Minemoto, Sagamihara, JP Atsuhiko Urushihara, Kokubunji, JP	Prior art including at least the Hitachi VisionDesk and/or U.S. Pat. 6,188,569)

Takeshi Hoshino, Kodaira, JP Taisuke Kashima, Urawa, JP Satoshi Hamazaki, Fujisawa, JP Masaaki Hiramatsu, Ebina, JP	
Robert R. Crockett, Central, S.C.	Prior art including at least US Pat. 5,363,276
Per Hogdahl, Palm Beach Gardens, FL William Hart, Lake Park, FL Charles Krallman, Singer Island, FL Kenneth Shaw, Palm Beach Gardens, FL	Prior art including at least US Pat. 5,264,992
Robert C. McKillip, Seal Beach, CA	Prior art including at least US Pat. 5,272,601
Hideaki Fujimori, Tokyo Tetsu Ishikawa, Tochigi Yoshihisa Tamura, Grunma Minoru Imaizumi, Saitama	Prior art including at least US Pat 5,379,182
Glenn D. Bonsall, Vancouver Ezra T. Peachey, Vancouver Gary O Kaga, West Vancouver	Prior art including at least US Pat 5,636,101
H. Douglas Johns, Atlanta, GA Nicholas G. Forlenza, Marietta, GA Gregory K. Adams, Roswell, GA Jeffrey M. Reents, Atlanta, GA Michael C. Mayne, Conyers, GA Carl R. Spoeth, Bayonet Point, FL	Prior art including at least US Pat 5,835,343
Harry C. Sweere, Minneapolis, MN Michael D. Gonnerman, Eagan. MN Donald M. Voeller, Eagan, MN	Prior art including at least Ergotron, Inc. supported products
Jeff Salazar and other current or former employees of Lunar Design 541 Eighth Street. San Francisco, CA 94103.	Prior art including at least certain Hewlett Packard Products and Apple Computer Products
Tim Brown and other current or former employees of IDEO 100 Forest Ave Palo Alto, CA 94301	Prior art including at least certain Samsung FPD Products
John Grundy Holly Wells	Prior art including at least 300Xa Super- TFT 13.3-inch Nokia LCD Display
Harada, Yoshinori; Osaka, Japan Takami, Mitsuru; Osaka, Japan Usui, Shigeo; Osaka, Japan	Prior art including at least US Des. Patent 356077: Monitor television receiver
Marina J. Falkner, Arlington MA	Prior art including at least US Des. Patent 328,291 Digital Equipment Corp

TROC and TUS respectively are further informed and believe that in addition to those listed above, current and former employees of the law firm McKenna, Long & Aldridge and its predecessors and of Loeb & Loeb will likely have discoverable information related to the patents-in-suit, prior art and prosecution of the patents-in-suit.

TROC and TUS respectively are further informed and believe that current and former employees of at least the following companies and their affiliates, whether now operating or dissolved, will likely have discoverable information related to relevant prior art which prior art may invalidate the patents-in-suit or claims thereof, effect construction of such claims or otherwise be relevant to issues presented by this action: Acer Peripherals; ADI; Advan; Advantech; Akia; Apple Computer; Artworks; Asuko Co.; AST; Aydin Displays; BARCO Display Systems; Batron (Data Modul); Canon Inc.; Compal (Sceptre); Compaq; CTX Opto; DEC; Dell Computer; Dolch Computer Systems; Dynapro Techonologies (3M); Eaton; Eizo Nanao; Electro-Plasma; Ergotron, Inc.; Fujitsu Ltd.; Fujitsu-Siemens; Hitachi Ltd.; Hewlett Packard; IBM; IDEO; Iiyama Electric; FED Corp (eMagin Corp); Kent Digital Science (Kent Displays); Keycorp; Korea Computer; Korea Data Systems (KDS); LG Electronics; LG Philips LCD; Lunar Design; MAG Innovision; Matsushita Electric Industrial Co.; MELCO; Microvitec; Mitsubishi Electric; Monorail, Inc.; NCR Corporation; NEC Technologies; Nokia; Panasonic; Philips; PixelVision; Photonics Imaging (Photonics System); Planar Systems; Plasmaco; Princeton Graphics; Rever Computer Inc.; Rockwell International Corporation; SAMPO Corporation; Samsung; Sharp; Siemens; Sun Microsystems, Inc.; Sumitomo; Symbol Technologies; Tatung; Taxan; Tektronix; Three-Five Systems, Inc.; Viewsonic Corporation; ViewTek; Wyse Technology; Ziba Design.

Further, TROC and TUS are respectively informed and believe that current and former employees of the following companies and their affiliates, whether now operating or dissolved, will likely have discoverable information related to relevant prior art which prior art may invalidate the patents-in-suit or claims thereof, effect construction of such claims or otherwise be relevant to issues presented by this action, based at least upon these companies having been market participants prior to the time of application for the Patents-In-Suit:

Chinese FPD Producers:

Anshan Sante Electronics Co. Ltd.; CASIL Optoelectronic Product Development Ltd.; Changzhou Douguan LCD Co. Ltd.; Clover Display Ltd.; Dalian Eastern Display Co., Ltd.; Dian Guang Electronics Ltd.; Elec & Eltek Display Technology Ltd.; Fordic Components; Hainan Ocular Electronics Co., Ltd; Hebei Jiya Electronics Co. Ltd.; Hoyu and Taiwa LCD; Intech LCD Group; Jilin Tonghai Hi-Technology Co. Ltd.; ODS; RCL; Shanghai Hai Jing Electron Co. Ltd.; Shantou Go World Display Co.; Shenzhen Asian Liquid Crystal Displayer Co. Ltd.; Shenzhen Jinghua Displays Co. Ltd.; Shenzhen Orient Display Co. Ltd.; Shenzhen STD Display Technology Engineering Co., Ltd.; Smartech Display Ltd.; Sunway Electronics Co.; Tianma Microelectronics; TQL Technology; Truly Semiconductors Ltd; Varitronix International; Xiamen Ocular LCD Devices Co., Ltd; Yeebo LCD Ltd.

Japanese FPD Producers:

Adamant Kogyo Co., Ltd.; Advanced Display Inc. (ADI) (Mitsubishi Electric Corp.); Alps Electric Co., Ltd.; Canon Inc.; Casio Computer Co., Ltd.; Citizen Watch Co., Ltd.; Denso Corp.; Fujitsu; Futaba Corp.; Hitachi Manufacturing; Hosiden; Hosiden

and Philips Display Corp. (HAPD); Hunet; Idemitsu Kosan; Ise Electronics Corp.; Kyocera Corp.; Matsushita Electric Industry; Mitsubishi Electric; Nanox Corp.; NEC Corp.; Okaya Electric; Optrex; Pioneer; Ricoh; Rohm Co., Ltd.; Sanyo LCD Engineering; Seiko Epson Corp.; Seiko Instruments; Sharp; Sony Corp.; ST LCD; Stanley Electric; Toshiba Corp.; Tottori Sanyo.

Korean FPD Producers:

Hyundai Electronics Industries; Korea Electronics Corp.; LG Electronics; LG LCD; Orion Electric; Samsung Display Devices; Samsung Electronics Co., Ltd.

North American FPD Producers:

Advanced Display Systems, Inc.; Alien Technology Corp.; Candescent Technologies Corp.; Colorado MicroDisplay; Crystaloid; Digital Reflection, Inc.; Displaytech; dpiX; Eastman Kodak; FED Corp.; IBM; inViso; Iridigm; Kent Displays, Inc.; Kopin; MicroDisplay Corp.; Microvision; Motorola; Planar Display; Retinal Displays, Inc.; Sarif; SI Diamond Technology, Inc.; Silicon Light Machines; SpatiaLight; S-Vision; Texas Instruments (TI); Three-Five; Uniax Polymer Electronics; Universal Display Corporation; Westaim.

Taiwanese FPD Producers:

Acer Display Technology; Chi Mei Optoelectronics; Chunghwa Picture Tubes; Giantplus Technology Corp.; Grand Pacific Optoelectronics; HannStar Display; Industrial Technology Research Institute (ITRI); Nan Ya Plastic; Picvue Electronics Ltd.; PrimeView International; Quanta Computer; Unipac Optoelectronics; United Radiant Technology Corp.; Wintek.

Other FPD Producers:

Cambridge Display Technologies; Crystal Clear Technology; MicroPix; Opsys; PixTech; Printable Field Emitters Ltd.; Printed Circuits International Ltd.; Royal Philips Electronics; Thompson S.A.; Vikay Technology.

TROC and TUS respectively anticipate that additional company, firm or individual witnesses may be located or identified during the course of discovery in this action, including but not limited to discovery concerning the particular products alleged by plaintiff to infringe.

TROC and TUS respectively further anticipate potentially calling additional witnesses identified through the course of discovery, including but not limited to witnesses, identified through documents produced herein, identified in interrogatories or otherwise obtained or identified in connection with discovery related to and investigation of the claims, allegations and facts presented by this case.

TROC and TUS each further notes that it anticipates relying upon expert testimony, that TROC and TUS respectively has yet to designate any testifying experts for this case. TROC and TUS respectively will identify testifying experts and their opinion in accordance with the Court's scheduling and protective orders.

**2. Fed. R. Civ. P. 26(a)(1)(B) Document Categories**

Based on the limited information available to TROC and TUS, each anticipates, without limitation, that at least the following categories of documents, data compilations and/or tangible things within TROC or TUS's possession, custody or control may be used by TROC and/or TUS to support claims or defenses:

- Documents, data compilations and/or tangible things related to the patents-in-suit and their prosecution history;
- Documents, data compilations and/or tangible things relating to prior art to the patents-in-suit, including but not limited to publications, exemplars, technical and sales information;
- Documents, data compilations and/or tangible things including at least pleadings, discovery responses and testimony previously provided or produced by non-parties and/or parties to this action and such documents, data compilations and/or tangible things as may be produced or developed herein in response to future discovery;
- Documents, data compilations and/or tangible things relating to the design and development of accused products;
- Documents, data compilations and/or tangible things relating to the manufacture of accused products;
- Documents, data compilations and/or tangible things relating to the sale and marketing of accused products;
- Documents, data compilations and/or tangible things as may be relevant to the defenses of Plaintiff's damages allegations and such damages theories as plaintiff may develop, which may include sales and expense information concerning accused products.

TUS and TROC note, that documents, data compilations and/or tangible things in the possession of one of them may or may not be in the possession, custody or control of the other and each reserves the right to supplement the following disclosure after further

discovery and investigation. Neither TROC nor TUS waive any objection or claim of privilege, whether expressly asserted or not, by this identification or subsequent production and each reserves the right to object to any inadvertently identified or produced document on the grounds of attorney-client privilege or work product doctrine as to that document and to otherwise object to the introduction into evidence of any document produced herein under applicable law.

TROC and TUS each further anticipates that documents, data compilations and/or tangible things in the possession, custody or control of Plaintiff and/or third parties, including such items related to, but not limited to, licensing, assignment, prior art, infringement allegations, patent prosecution, and technical information regarding, *inter alia*, FPD products and designs, and/or damages allegations may be used to support claims or defenses.

Each of TROC and TUS further reserve the right to object to the production of any document, data compilation and/or tangible thing identified herein until such time as an appropriate protective order has been entered herein and/or based upon any order of the Court regarding case management issues.

Documents, data compilations and/or tangible things within the possession, custody or control of either TROC or TUS may be inspected at the law offices of Baum & Weems, 58 Katrina Lane, San Anselmo, CA 94960, or at such other place as counsel may agree, during regular business hours upon reasonable notice and subject to the agreement of counsel.

The above categories of documents, data compilations and tangible things, is made without prejudice to either TROC or TUS further supplementation, identification

and/or refinement of categories of documents, data compilations and tangible things as further information comes to their respective attention or the significance of information becomes appreciated during the course of litigation.

**3. Fed. R. Civ. P. 26(a)(1)(C) Computation of Damages**

Not applicable at this time. Pursuant to Federal Rule of Civil Procedure 26(a)(1)(C), however, TROC and TUS respectively contend they will be entitled to damages equal to their attorneys fees and costs in defending against meritless infringement claims and each reserves the right to provide information concerning such damages calculation after further discovery and investigation.

**4. Insurance Agreements**

TROC and TUS are each currently unaware of any applicable insurance agreement.

ROSENTHAL, MONHAIT, GROSS & GODDESS, P.A.

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Jeffrey S. Goddess (Del. Bar. No. 630)  
Rosenthal, Monhait, Gross & Goddess, P.A.  
919 Market Street, Suite 1401  
P.O. Box 1070  
Wilmington, Delaware 19899-1070  
Tel: 302-656-4433  
Fax: 302-658-7567  
jgoddess@rmgglaw.com

OF COUNSEL:

Julian M. Baum  
Robert C. Weems  
BAUM & WEEMS  
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San Anselmo, CA 94960  
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v. :  
: TATUNG CO., TATUNG COMPANY :  
: OF AMERICA, INC., and VIEWSONIC :  
: CORPORATION, :  
: Defendants :  
:

**NOTICE OF SERVICE**

PLEASE TAKE NOTICE that copies of the COMBINED INITIAL  
DISCLOSURE OF DEFENDANT TATUNG COMPANY OF AMERICA AND  
TATUNG COMPANY were served upon the following counsel on July 29, 2005 in the  
manners indicated:

**BY E-MAIL AND BY HAND**

Richard L. Horwitz, Esquire  
David E. Moore, Esquire  
POTTER ANDERSON & CORROON LLP  
1313 N. Market Street, 6<sup>th</sup> Floor  
Wilmington, DE 19801

Richard D. Kirk, Esquire  
THE BAYARD FIRM  
222 Delaware Avenue, Suite 900  
Wilmington, DE 19801

BY E-MAIL AND U.S. MAIL

Scott Miller, Esquire  
Tracy Roman, Esquire  
BINGHAM MCCUTCHEN LLP  
355 South Grant Avenue  
44<sup>th</sup> Floor  
Los Angeles, CA 90071-3106

Daniel G. Jarcho, Esquire  
Cass W. Christenson, Esquire  
MCKENNA LONG & ALDRIDGE LLP  
1900 K Street, NW  
Washington, DC 20006

ROSENTHAL, MONHAIT, GROSS  
& GODDESS, P.A.



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Jeffrey S. Goddess (DSBA No. 630)  
919 Market Street, Suite 1401  
P.O. Box 1070  
Wilmington, DE 19899-1070  
(302) 656-4433  
[jgoddess@rmgglaw.com](mailto:jgoddess@rmgglaw.com)

OF COUNSEL:

Julian M. Baum  
Robert C. Weems  
BAUM & WEEMS  
58 Katrina Lane  
San Anselmo, CA 94960  
(415) 460-1791

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